

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

ANTONIO D. HANDLEY,

Plaintiff,

vs.

WEXFORD HEALTH SOURCES, INC., *et al.*,

Defendants.

No. 2:21-cv-00058-JPH-DLP

FILED

08/02/2021

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

Comes the Plaintiff, Antonio Handley, *pro se*, pursuant to Federal Rule 34 to direct the Defendants: WEXFORD Health Sources, Inc., Dr. Michael Mitcheff, Nurse Adrina McDonald, and Nurse Amy Wright to produce for inspection, photo-copying, and reproduction, by the Plaintiff, Antonio Handley, within thirty (30) days of the date of service of this request – or at such other time and place as may be stipulated by the attorneys for the named parties – the following documents, objects or other tangible things:

1. Wexford Health Sources, Inc.: all medical records pertaining to the Plaintiff, Antonio Devon Handley, DOC# 998126 that are in its possession or the possession of its custodian of records, third-party personnel, *et cetera*, including but not limited to:

- a. all reports, bills, records, or other documents – medical or otherwise – which indicated the nature and extent of the injuries and damages claimed;
- b. all radiographs, photographs, videotapes, slides, diagrams, or any tangible material relating to the matters alleged in complaint dating from 2012 to present;
- c. all notes, memoranda of conversations, un-transcribed tapes, correspondence between and by all defendants for matters relating to the injuries of Ryan Patrick Rucker;

- d. all emails to or from the named defendants: Dr. Michael Mitcheff, Nurse McDonald, Nurse Wright, and subcontractor, Dr. Lewton that pertain to the Plaintiff, Antonio Handley – using keywords: “Antonio Handley,” “#998126,” “Alternative Treatment Plan,” “Cataracts,” “Consult,” and “Specialist.”
- e. The Defendants are requested to provide any other materials that are relevant to this action and the Plaintiff, Antonio Handley.

2. Dr. Dennis Lewton: Handley requests that the Defendant, Wexford Health Sources, Inc., *provide the contact information for its subcontracting optometrist, Defendant, Dr. Lewton*. Wexford is also requested to release all documents that were generated by Dr. Lewton – as part of his collegial practice with Wexford providers.

3. These materials are relevant and necessary in the event the Defendants intend to file a dispositive motion in this action, or if a jury trial is conducted.

4. Handley agrees to any teleconference hearing for the purposes of stipulating to the production of the requested documents.

Counsel for parties are further requested to furnish an affidavit stating that production of the requested materials has been completed, within thirty (30) days of the filing of this request, and to provide a list of such items not produced. In the event of an objection, the parties should state the grounds for the objection, and provide the name and address of the person having custody of the requested discovery items.

Respectfully submitted,

/s/ Antonio Devon Handley
DOC# 998126

Appellant, *pro se*
Wabash Valley Correctional Facility
6908 S. Old U.S. Hwy 41, P. O. Box 1111
Carlisle, Indiana 47838

CERTIFICATE OF SERVICE

I certify that on this 2nd day of **August, 2021**, a copy of the foregoing, PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, was served upon all parties by Indiana's Electronic Prison (E-filing) system.

Distribution:

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*Counsel for Defendants, Wexford Health Sources, Inc.,
Adrina McDonald, Michael Mitcheff, Amy Wright*

Dr. Dennis Lewton
Served by U.S. Mail
(pending provision of address)

/s/ Antonio Devon Handley

DOC# 998126

Appellant, *pro se*

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